

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TIFFANY SMITH,

Plaintiff,

v.

PEACHES OF ATLANTA
GENTLEMEN'S CLUB and
CORNELIUS STEPHENS,

Defendants.

Civil Action File No.

COMPLAINT

Plaintiff Tiffany Smith ("Ms. Smith") states her complaint against the above-named Defendants as follows.

1. This is a complaint for unpaid wages in violation of the Fair Labor Standards Act ("FLSA") and O.C.G.A. § 34-4-3.
2. This Court has jurisdiction over Ms. Smith's claims, and venue is proper in this Court.
3. Defendant Peaches of Atlanta Gentlemen's Club ("Peaches of Atlanta") is an adult entertainment establishment located at 779 Ralph David Abernathy Boulevard in Atlanta, Georgia.
4. Defendant Cornelius Stephens ("Stephens") owns and operates Peaches of

Atlanta.

5. As the owner of Peaches of Atlanta, Stephens determines and controls the club's methods of compensating its dancers and other employees.
6. Within the three-year period preceding the filing of this complaint, Peaches of Atlanta and Stephens (collectively "Defendants") jointly employed Ms. Smith as a "house mom".
7. Defendants did not pay Ms. Smith any wages for her services as a house mom. Instead, Ms. Smith received a fee from each dancer who performed during Ms. Smith's shifts.
8. Defendants also required Ms. Smith to attend company meetings and train other employees. Defendants did not compensate Ms. Smith for her working hours related to these activities.
9. COUNT 1 (Violation of the FLSA) - Defendants violated the FLSA by failing to pay Ms. Smith the required minimum wage.
10. COUNT 2 (Violation of O.C.G.A. § 34-4-3) - Defendants violated O.C.G.A. § 34-4-3 by failing to pay Ms. Smith the required minimum wage under Georgia law.
11. Defendants' violation of the FLSA described above was willful.

Based on the above facts, Ms. Smith requests a jury trial on all triable issues and asks the Court for the following relief: unpaid wages, liquidated damages as permitted by the FLSA, prejudgment interest, litigation costs, attorneys' fees, and other relief deemed appropriate by the Court.

Respectfully submitted on November 27, 2017.

s/ Regan Keebaugh
Regan Keebaugh
Georgia Bar No. 535500

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